"Brown III, Chester" <cbrown@bipinc.com>

09/04/2003 05:30 PM

To: Group Ow-Docket@EPA cc: kenszyman@aol.com

Subject:

I applaud the EPA's efforts to consider not classifying apartment communities that submeter their tenant's water consumption as public water systems. Owners of apartment communities who desire to submeter water consumption on their properties should not be considered a public utility because they are simply measuring an individual unit's water use rather than actaully distributing the water. Classifying apartment communities that do submeter as public utilities is time consuming and results in needless, costlly water testing, testing which has already been performed by the local municipality.

Individual apartment water billing encourages water conservation because tenants then have the impetus to report leaks and reduce their own water consumption. Every effort should be made to encourage water conservation and not classifying apartment communities who submeter water consumption as a public utility will help do so. Thank you.

Chester H. Brown, III CCIM

Brown Investment Properties, Inc.

P.O. Box 930 (27402)

440 West Market Street

Greensboro, N.C. 27401

(336) 541-5504